

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE CHICAGO BRIDGE & IRON
COMPANY N.V. SECURITIES LITIGATION

)
) **CASE NO. 1:17-CV-1580**
)
) Hon. Lorna Schofield
)
)

PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

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40, 361, & 417 – Union Security Funds
and Iron Workers Local 580 – Joint
Funds*

Class Representative and Lead Plaintiff ALSAR Ltd. Partnership (“ALSAR”), together with Additional Plaintiffs and Class Representatives Iron Workers Local 40, 362, & 417 – Union Security Funds and Iron Workers Local 580 – Joint Funds (together “Iron Workers” and collectively with ALSAR, “Plaintiffs” or “Class Representatives”), respectfully move this Court for an Order to: (1) finally approve a \$44,000,000 settlement that will dispose of all claims in this Action; (2) find that the Notice plan it approved at preliminary approval met all applicable requirements; and (3) approve the Plan of Allocation for the disbursement of the proceeds among Class Members. In support thereof, Plaintiffs file the accompanying Memorandum of Law and Declaration of Kim E. Miller. A [Proposed] Order with respect to both this Motion and the Motion for An Award of Attorneys’ Fees and Expenses and Compensatory Awards for Plaintiffs will be attached to reply papers, so that it can be adjusted after the exclusion deadline to reflect parties seeking exclusion.

DATED: June 27, 2022

Respectfully submitted,

KAHN SWICK & FOTI, LLC

/s/ Kim E. Miller

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Class*

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing Plaintiffs' Motion for Final Approval of Class
Action Settlement on Defendants on June 27, 2022 via CM/ECF.

/s/ Kim E. Miller
Kim E. Miller